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19
20 **UNITED STATES DISTRICT COURT**
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

22 UNITED STATES OF AMERICA,

CASE NO. 3:25-CV-04849-SI

23 Plaintiff,

Coordinated with

24 v.

Case No. 4:25-CV-04849

25 FATHI ABDULRAHIM HARARA and
NATIVE GROUNDS, LLC, d/b/a
JERUSALEM COFFEE HOUSE,

**JOINT STIPULATION *AS AMENDED*
BY THE COURT AND
[PROPOSED] AMENDMENT TO
CASE MANAGEMENT ORDER**

26
27 Defendants.

1 MICHAEL RADICE

2 Plaintiff,

3 vs.

4 JERUSALEM BOXING CLUB, LLC;
5 NATIVE GROUNDS, INC.; ABDULRAHIM
6 HARARA; DOES 1–20

7 Defendants.



8 Date: December 9, 2025

9 At midnight on September 30, 2025, the appropriations act that had been funding the Department
10 of Justice expired and appropriations to the Department lapsed. On October 31, 2025, the parties jointly
11 requested a stay of the litigation, *Dkt. 32*, which the Court granted on the same date, *Dkt 33*. The Court
12 ordered the United States to “promptly notify the Court as soon as the government shutdown has ended
13 and confer with opposing counsel submit within two weeks a revised joint proposed schedule, including
14 rescheduling the parties’ case management conference currently scheduled for November 14, 2025.”

15 *Dkt. 33*.

16 Appropriations were restored on the evening of November 12, 2025, for a total lapse of 43 days.
17 On November 17, 2025, the United States timely notified the Court that appropriations had been
18 restored and that the United States would confer with counsel and file a proposed case management
19 order on or before November 26, 2025.

20 The United States conferred with Defendants’ counsel as well as counsel for Plaintiff in the
21 related case, *Radice v. Jerusalem Boxing Club, LLC et al.*, Case No. 3:25-cv-02060. Given the time lost
22 due to the lapse in appropriations, the parties have stipulated to the following proposed schedule:

Event	Current Date	Proposed Date
Expert Disclosures	December 15, 2025	January 15, 2026
Expert Rebuttal Disclosures	January 15, 2026	February 16, 2026
Close of Discovery	February 28, 2026	NO CHANGE
Dispositive Motions	March 31, 2026	NO CHANGE

28 JOINT STIPULATION AND [PROPOSED] AMENDMENT TO CASE MANAGEMENT ORDER
CASE NOS. 3:25-CV-04849-SI & 4:25-CV-04849

1 Opposition Briefs	April 26, 2026	NO CHANGE
2 Reply Briefs	May 5, 2026	NO CHANGE
3 Final Pretrial Conference	<i>July 7, 2026</i>	Corrected date. NO CHANGE
4 Trial Begins	<i>July 20, 2026</i>	Corrected date. NO CHANGE

5
6 The proposed change to expert discovery deadlines is limited and does not affect other deadlines
7 in the case.

8
9 DATED: December 5, 2025

10 /s/ Michael Dominic Meuti
11 MICHAEL DOMINIC MEUTI (CA 227939)
12 *Counsel for Plaintiff Michael Radice*

13 ***

14 HARMEET K. DHILLON
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16 CARRIE PAGNUCCO
17 Chief

18 /s/ Amie S. Murphy
19 AMIE S. MURPHY (NYBN 4147401)
20 *Counsel for Plaintiff United States of America*

21 ***

22 /s/ Glenn Katon
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